

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

WORDLOGIC CORPORATION and
602531 BRITISH COLUMBIA LTD,

Plaintiffs,

vs.

MEDLINE INDUSTRIES, INC.,

Defendant.

Civil Action File No.: 5:20-cv-14

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs WordLogic Corporation (“WordLogic”) and 602531 British Columbia Ltd. (“BC”), together (the “Plaintiffs”), by and through their undersigned attorneys, for this original Complaint against Defendant Medline Industries, Inc. (“Medline” or “Defendant”), allege, based on its own knowledge with respect to itself and its own actions and based on information and belief as to all other matters, as follows:

INTRODUCTION

1.

This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code to enjoin infringement and obtain damages from Defendant’s unauthorized manufacture, use, sale, offer to sell, and/or importation into the United States for the subsequent use or sale of products or methods that infringe one or more claims of U.S. Patent Nos. 7,681,124 and 8,552,984.

JURISDICTION AND VENUE

2.

WordLogic Corporation is a Nevada corporation having its principal place of business at 1130 West Pender Street, Suite 230, Vancouver, British Columbia V6E 4A4, Canada.

3.

Plaintiff 602531 British Columbia Ltd. is a Canadian limited liability company with a principal place of business at 1130 West Pender Street, Suite 230, Vancouver, British Columbia V6E 4A4, Canada.

4.

On information and belief, Defendant Medline Industries, Inc. is a company formed under the laws of the State of Illinois. Medline Industries is registered with the State of Texas to transact business in the state, it has an online business, many offices, distribution and manufacturing plants throughout the state; including a manufacturing and distribution location at 12002 General Milton Dr., Laredo, TX 78045. On information and belief, Medline manufactures and distributes an extensive list of medical healthcare supplies online and through its distribution center in Laredo and throughout the Southern District of Texas.

5.

Upon information and belief, Defendant may be served this Complaint by service upon its registered agent Corporation Service Company dba CSC - Lawyers Incorporating Service Company at 211 E. 7th Street, Suite 620, Austin, TX 78701.

6.

This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284-285, among others. This Court has subject matter jurisdiction over all causes of

action set forth herein pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

7.

Venue is proper in this judicial district and division pursuant to 28 U.S.C. §§1391(b) and (c) and 1400(b) in that, upon information and belief, Defendant has a manufacturing and distribution center location at 12002 General Milton Dr., Laredo, TX 78045. Defendant routinely does business within this district, Defendant has committed acts of infringement within this district, and Defendant continues to commit acts of infringement within this district.

8.

Upon information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to Defendant's substantial business in this State and judicial district, including: (i) at least a portion of the infringements alleged herein; and/or (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

ALLEGATIONS COMMON TO ALL COUNTS

9.

Plaintiff 602531 British Columbia Ltd. owns all right, title, interest in, and has standing to sue for infringement of United States Patent No. 7,681,124 ("the '124 Patent"), entitled "Data Entry for Personal Computing Devices," issued on March 16, 2010. A copy of the '124 Patent is attached as Exhibit 1.

10.

WordLogic is a global leader and innovator in the field of predictive text input technology for computerized devices. Predictive text input technology typically comprises software and/or computer code executed on person computers, websites, handheld tablets, smart phones and other touch screen devices that assists the user in entering text and data on personal computers, websites, handheld tablets, smart phones and other touch screen devices.

11.

WordLogic has been developing predictive text input technology since the late 1990's. WordLogic's technology has been developed, utilized and licensed for use on a wide variety of devices and applications including PC's smart phones, tablets websites, media players, navigational systems and game consoles.

12.

WordLogic's technology has been recognized as a leader in the field including the 2014 North American Enabling Technology Leadership Award for Predictive Keyboard Applications.

13.

WordLogic's predictive keyboard application known as iKnowU® is a contextually aware predictive keyboard that makes typing easier, faster and more accurate for mobile users. The application predicts what the user is about to type and helps complete the sentence with reduced effort. The application predicts the next most likely letters, words and phrases, which significantly reduces the number of keystrokes needed to complete the text.

14.

WordLogic's predictive keyboard application known as iKnowU® is covered by the claims of the '124 asserted in this action, as well as other WordLogic patents.

15.

Defendant is in the business of operating in store and online retail businesses partnering with biopharma companies, care providers, pharmacies, manufacturers, governments and others to deliver the right medicines, medical products and healthcare services to the patients who need them, when they need them.

COUNT I

DIRECT INFRINGEMENT OF THE '124 PATENT

16.

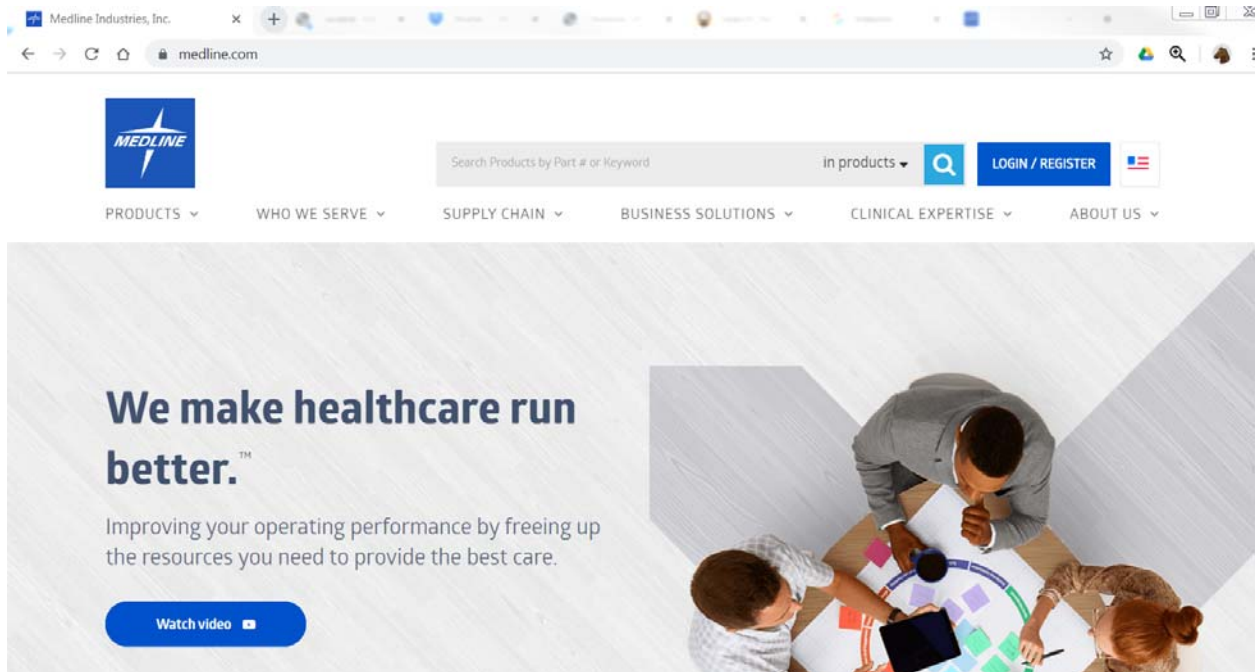
Plaintiffs incorporate by reference the allegations of Paragraphs 1-16.

17.

Defendant has directly infringed and continues to directly infringe at least one or more claims of the '124 Patent, through, among other activities, making, using, and incorporating into Defendant's website, keyboard predictive text with generated predictive text fields.

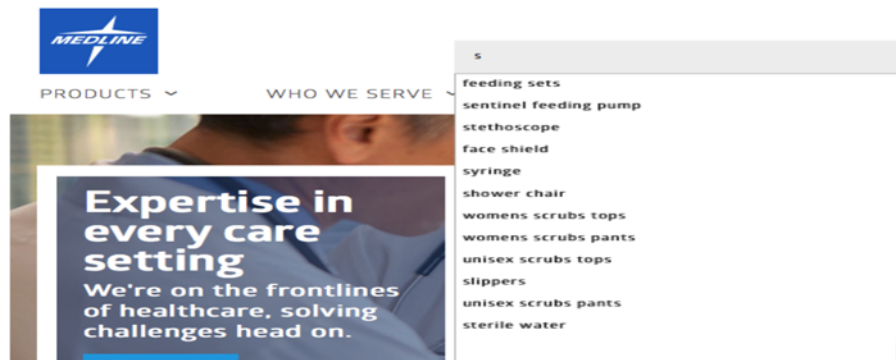
18.

The Defendant's website and its supporting infrastructure provides a computer-readable medium comprising codes for directing a processing unit to process text entered into a personal computing device and receiving and displaying a partial text entry, comprising receiving at least part of the partial text entry via a keyboard, the partial text entry comprising at least a first character.



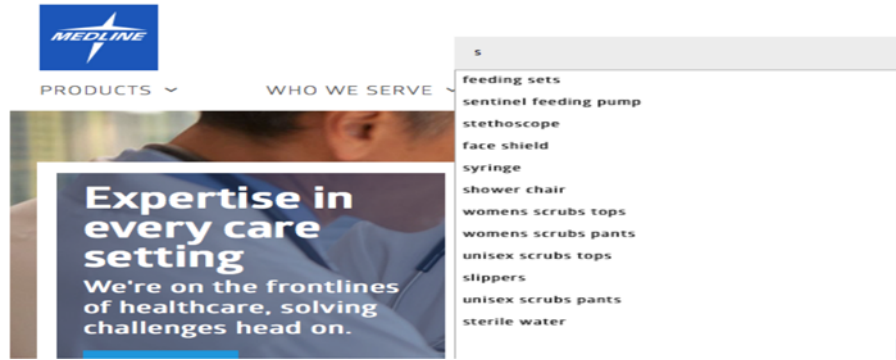
19.

The Defendant's website and its supporting infrastructure, in response to receipt of the first character of the partial text entry, obtains a plurality of completion candidates from among a group of completion candidates, wherein each of the plurality of completion candidates includes a portion matching the partial text entry. .



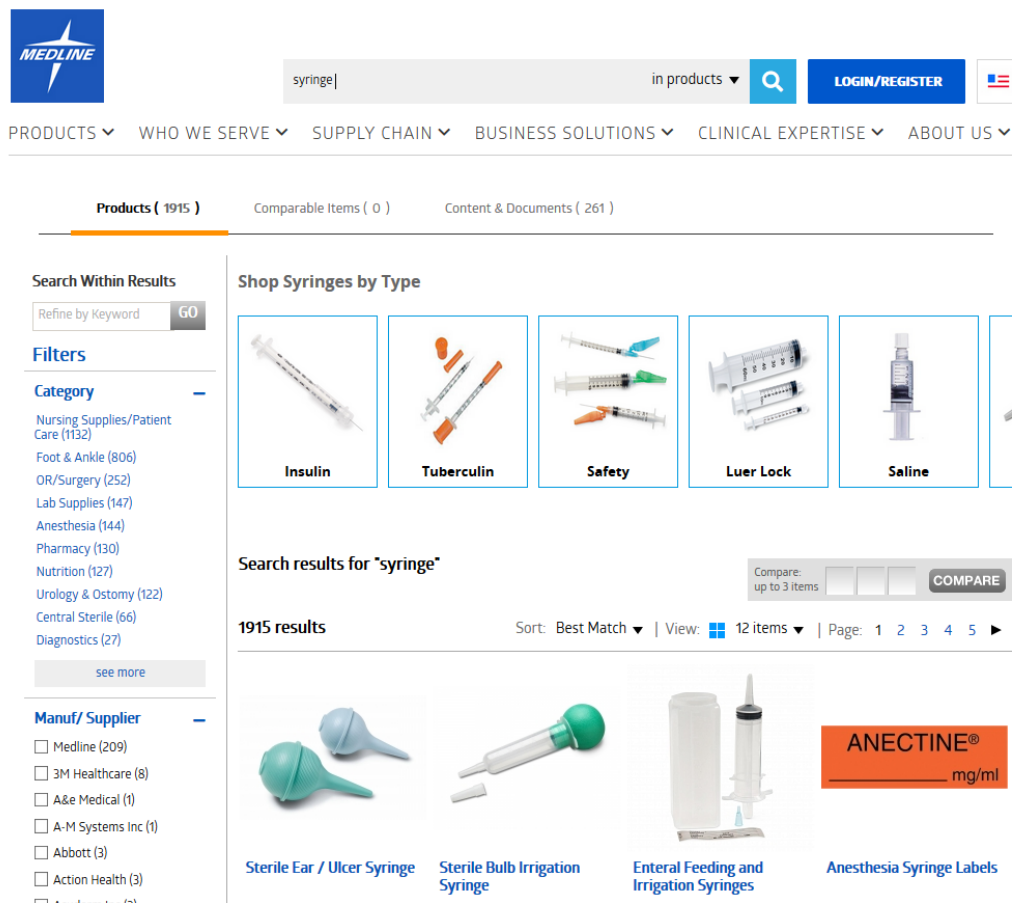
20.

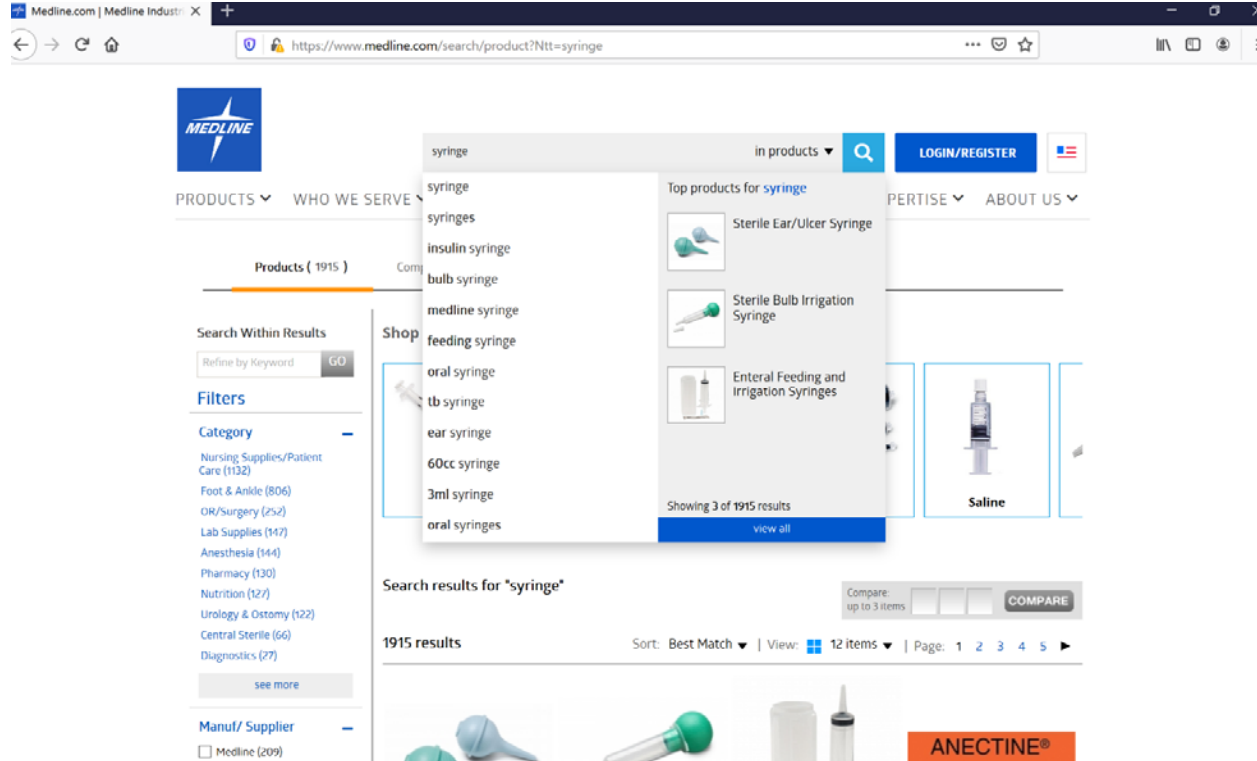
The Defendant's website and its supporting infrastructure displays the plurality of completion candidates in a search list within a graphical user interface.



21.

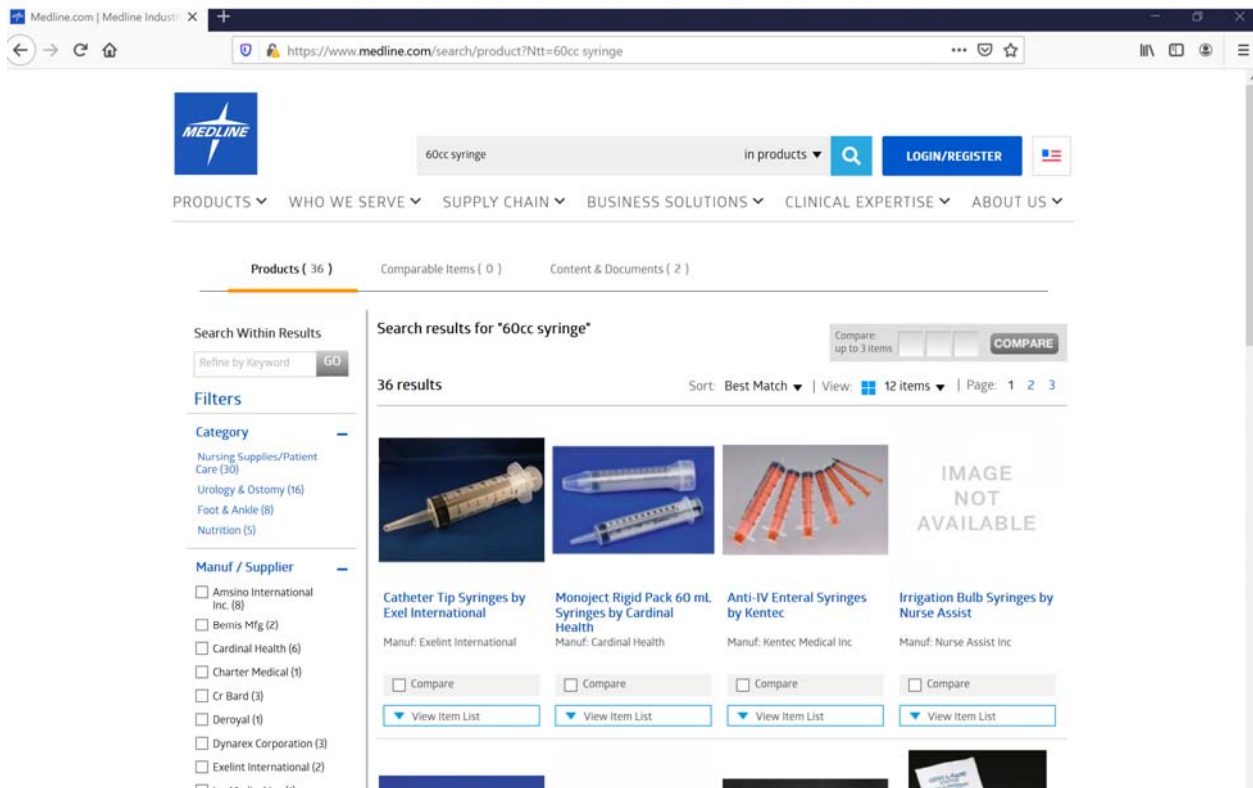
The Defendant's website and its supporting infrastructure detects user input corresponding to selection of a particular completion candidate from among the plurality of completion candidates displayed in the search list.





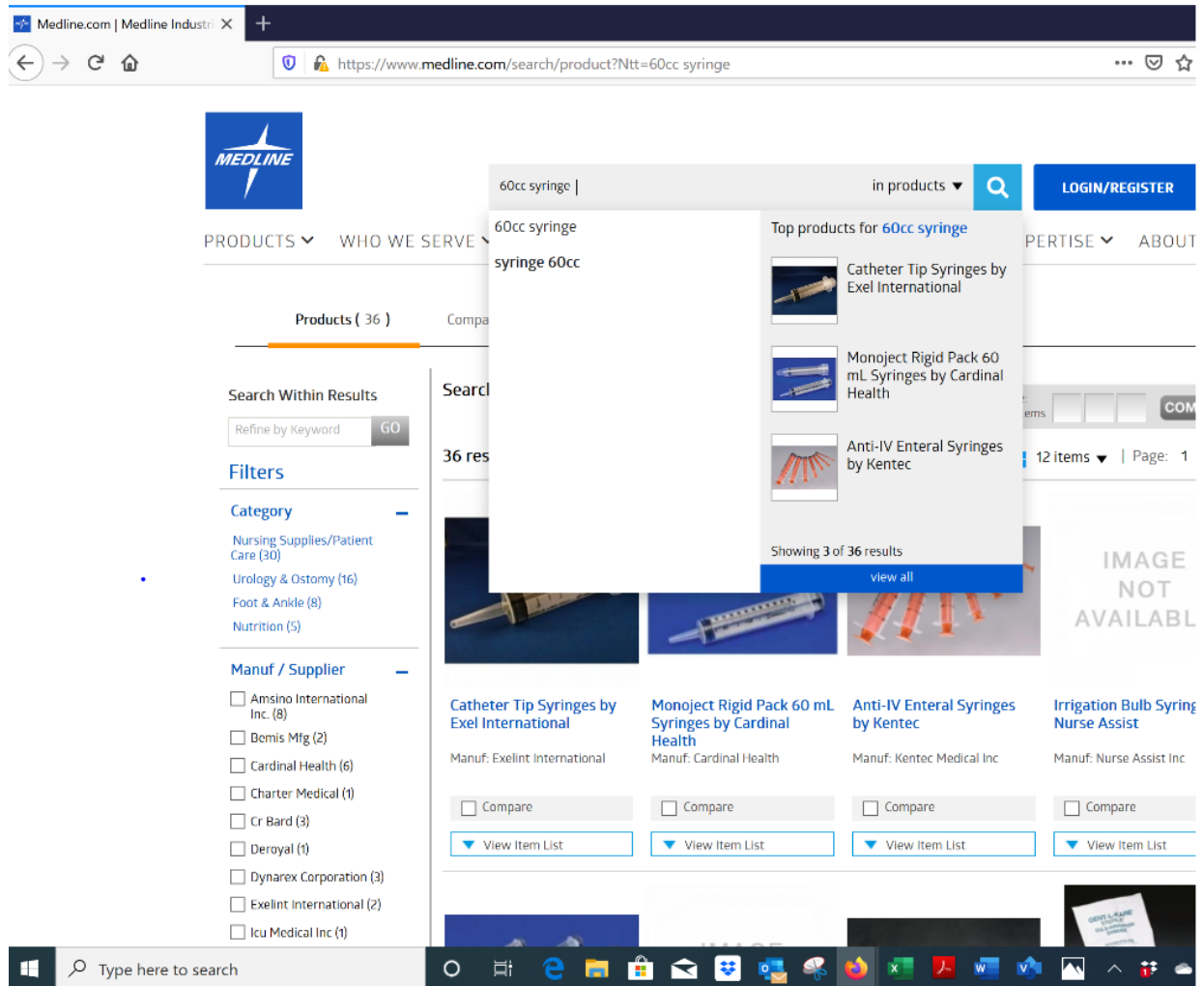
22.

The Defendant's website and its supporting infrastructure allows for modifying the display of the partial text entry to correspond to the particular completion candidate selected from among the plurality of completion candidates at least while the particular completion candidate remains selected;



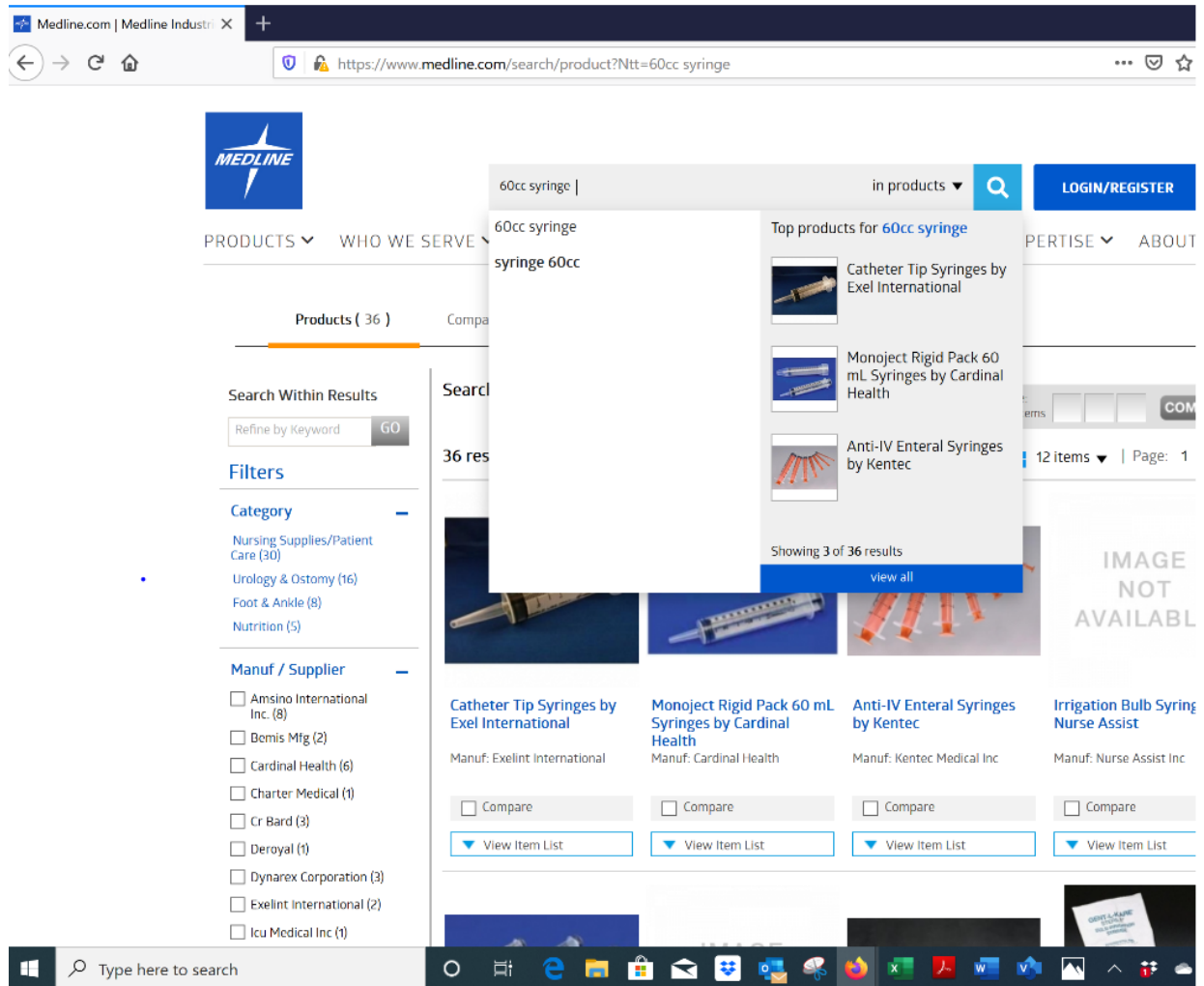
23.

The Defendant's website and its supporting infrastructure allows for detecting modification of the partial text entry by the user via the keyboard;



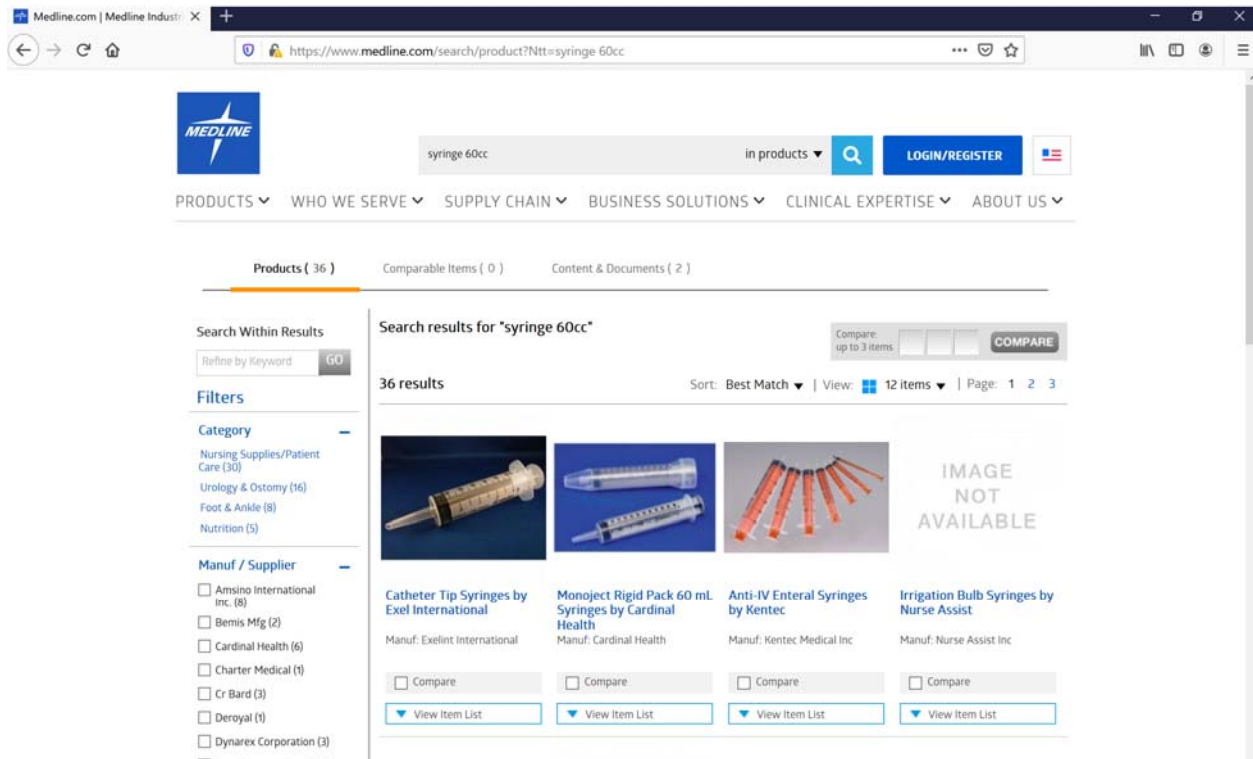
24.

The Defendant's website obtains and displays in the search list a modified plurality of completion candidates from among the group of completion candidates, if the partial text entry is modified via the keyboard, wherein each of the modified plurality of completion candidates includes a portion matching the partial text entry; and



25.

The Defendant's website obtains and displays in the search list a further modified plurality of completion candidates from among the group of completion candidates, if a completion candidate is accepted via the search list from the modified plurality of completion candidates, wherein each of the further modified plurality of completion candidates includes a portion matching the accepted completion candidate.



26.

The Defendant has been and is currently committing these acts of infringement without a license or authorization from Plaintiffs, and such acts of infringement are likely to continue unless enjoined by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief that the Court enter judgment in their favor and against Defendant, granting the following relief:

A. That the Court enter judgment that one or more claims of the '124 Patent have been infringed either literally and/or under the doctrine of equivalents, by Defendant;

B. That the Court enter judgment that one or more claims of the '124 Patent have been infringed either literally and/or under the doctrine of equivalents, by Defendant;

C. That Defendant be ordered to pay damages adequate to compensate Plaintiffs for its acts of infringement, pursuant to 35 U.S.C. § 284;

D. That Plaintiffs be awarded increased damages under 35 U.S.C. § 284 due to Defendant's willful infringement of the '124 Patent.

E. That the Court find that this case is exceptional and award Plaintiffs reasonable attorneys' fees pursuant to 35 U.S.C. § 285;

F. That Defendant, its officers, agents, employees, and those acting in privity with it, be preliminarily enjoined from further infringement, contributory infringement, and/or inducing infringement of the patent-in-suit, pursuant to 35 U.S.C. § 283;

G. That Defendant, its officers, agents, employees, and those acting in privity with it, be permanently enjoined from further infringement, contributory infringement, and/or inducing infringement of the patent-in-suit, pursuant to 35 U.S.C. § 283;

H. That Defendant be ordered to pay prejudgment and post-judgment interest;

I. That Defendant be ordered to pay all costs associated with this action; and

J. That Plaintiffs be granted such other and additional relief as the Court deems just, equitable, and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs demand a jury trial on all issues justiciable by a jury.

Respectfully Submitted,

This 30th day of January, 2020.

/s/ H. Artoush Ohanian

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